

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JOHN DOE, as Next Friend of JAMES DOE)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:16-CV-00546 JAR
)	
FORT ZUMWALT R-II SCHOOL DISTRICT,)	
)	
and)	
)	
MATTHEW M. HANSEN, Individually and in)	
Official Capacity as a Former Teacher of the)	
Fort Zumwalt R-II School District,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR CLERK'S ENTRY OF DEFAULT AND DEFAULT
JUDGMENT AGAINST DEFENDANT MATTHEW M. HANSEN ONLY**

COMES NOW, Plaintiff, by and through counsel, and pursuant to FRCP 55(b)(1), requests the clerk to enter default and default judgments against Defendant Matthew M. Hansen only. In support thereof, Plaintiff states as follows:

1. Plaintiff's Complaint was filed on April 22, 2016.
2. Defendant Hansen was served on May 2, 2016; and the executed summons was filed with this Court on May 13, 2016. (Document 7). Defendant Hansen's answer was due to be filed on May 23, 2016.
3. Defendant Matthew M. Hansen is now in default, and has had no contact with Plaintiff's counsel. Mr. Hansen has filed no responsive pleadings.
4. Plaintiff therefore requests a default judgment against Defendant Matthew M. Hansen as to liability only, as this case is being pursued as a class action which has not yet been certified as such.

WHEREFORE, Plaintiff respectfully requests a default judgment in the above styled matter against Defendant Matthew M. Hansen as to liability only.

Respectfully submitted,

THE BAGSBY LAW FIRM

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CERTIFICATE OF SERVICE

A copy of the foregoing was electronically filed and served this 26th day of May, 2016, to:

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